AFFIDA	AL OF PERMICE		
(INTIFF(S)	COURT TERM	1 and NO.	COUNTY
Jodi H. Brown	52-61-02	-25-1994	PHICA PA.
A and Arm A	DATE PREPA	RED	SERVED BY
MANCH FLAMM, PIERCE SR. COLLEGE			JOHN MAN SAUNGE
MAKA PLAMM, PIERCE SR. COLLEGE REVE AT MS. MAKA FLAMM, PLOKESSON 1400 PLAN 55.	Civil Action Summons		Subpoena Notice of Real Estate Sale
4.4	Dwillor -		Other
Phis A 19100		TROL NUMBE	CR
ECIAL INSTRUCTIONS			
the 21th day of OCYABUL AT 2:04 In 14th OR COLLEGE HILL OR	Supported to the Co	4	
the 2004 day of OCHANI A SILLA	SUICKUIS'OK MS . PLAK	118 B/K: 81	2; 110; BE.HME; DK.S.
1420 Per ST freet TR. COLLEGE HALL PA	·	at Wie	lex so. 1414 PM
mmonwealth of Pennsylvania, in the manner described	, County o	f PHILD	
Defendant(s) personally served	pelow:		
dult family member with whom said Defendance as a side	e(s). Relationship to		
dult family member with whom said Defendant(s) resid).	
dult family member with whom said Defendant(s) resid	give name or relationship	PERKUS MS.1	formuls superiorsak
dult family member with whom said Defendance as a side	give name or relationship	PERKUS MS.1	finan's superior sak Defendant company.
dult family member with whom said Defendant(s) residult in charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usualther	give name or relationship Il place of business, MS an off	PERKUS MS.1	Commis subsect sax Defendant company.
dult family member with whom said Defendant(s) residult in charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usual ther	give name or relationship al place of business. がい。 an off	Ptkkrå MS./ icer of said E	Defendant company.
dult family member with whom said Defendant(s) resided to charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usual ther scription Age: 30 Height: (", Weight the day of day of day of day of	give name or relationship al place of business. #15 an off [10] Race: 8	PULLES MS. Nicer of said E	Sex: F
dult family member with whom said Defendant(s) resided to charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usual ther scription Age: 30 Height: (", Weight the day of day of day of day of	give name or relationship al place of business. #15 an off [10] Race: 8	PULLES MS. Nicer of said E	Defendant company.
adult family member with whom said Defendant(s) resided to dult in charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usual other. Scription Age: 30 Height: ("L Weight the LOW HA)	give name or relationship al place of business. #15 an off [10] Race: 8	PULLES MS. Nicer of said E	Sex: F
dult family member with whom said Defendant(s) resident in charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usual ther cription Age: 30 Height: (" Leight Weight the Leight Age of Complete Weight Complete C	give name or relationship al place of business. #15 an off [10] Race: 8	PULLES MS. Nicer of said E	Sex: F
dult family member with whom said Defendant(s) resided dult in charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usual ther ceription Age: 30 Height: (", Weight the day of COOLAL endant not found because: _ Moved _ Unknown	give name or relationship al place of business. #15 an off [10] Race: 8	PULLES MS. Nicer of said E	Sex: F
Adult family member with whom said Defendant(s) resided to charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usual ther acription Age: 30 Height: "J. Weight the day of COOLEA endant not found because: \ Moved \ Unknown ME OF SERVER We MANGUAGE being duly sworn according to law.	give name or relationship al place of business. Prof. an off 100 Race: 8.	PULLES MS. Nicer of said E	Sex: F
dult family member with whom said Defendant(s) resided dult in charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usual ther deription Age: 30 Height: "J. Weight the day of UCTOUL	give name or relationship an off an o	PULLES MS. Nicer of said E	Sex: F
dult family member with whom said Defendant(s) resided dult in charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usual ther deription Age: 30 Height: "J. Weight the day of UCTOUL	give name or relationship an off an o	PULLES MS. Nicer of said E	Sex: F
dult family member with whom said Defendant(s) resided to charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usual ther scription Age: 30 Height: " Weight the day of Ucrould endant not found because: Moved Unknown ME OF SERVER W MINISTER being duly sworn according to law, the is process server herein names; and that the facts he and correct to the best of their knowledge, information in the server	give name or relationship an off an o	PULLES MS. Nicer of said E	Sex: F
dult family member with whom said Defendant(s) resident in charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usual ther ther cription Age: 30 Height: " Weight the day of Ucrould endant not found because: Moved Unknown ME OF SERVER W MANGARAL being duly sworn according to law, the is process server herein names; and that the facts he and correct to the best of their knowledge, information in the server in the se	give name or relationship an off an o	PULLES MS. Nicer of said E	Sex: F
dult family member with whom said Defendant(s) resided dult in charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usual ther ther ceription Age: 30 Height: " Weight the	give name or relationship an off an o	PACKED MS. A SIGNER OF SAID E	Sex: F
Adult family member with whom said Defendant(s) resided to dult in charge of Defendant's residence who refused to agent of person in charge of Defendants's office or usual other Scription Age: 30 Height: "J. Weight the J. M. day of J. Weight and and not found because: Moved Unknown ME OF SERVER W. M. M. M. M. L. M. being duly sworn according to law, the is process server herein names; and that the facts hand correct to the best of their knowledge, information iff Process Server's Name (1995) W. H. B. C. Server's Name (give name or relationship an off an o	PULLES MS. Nicer of said E	Sex: F
dult family member with whom said Defendant(s) resided dult in charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usual ther ceription Age: 30 Height: (") Weight the day of	give name or relationship an off an o	PARKERS MS. A SIGNER STATEST	Sex: F
dult family member with whom said Defendant(s) resident dult in charge of Defendant's residence who refused to gent of person in charge of Defendants's office or usual ther deription Age: 30 Height: " Weight the day of	give name or relationship an off an o	PARKERS MS. A SIGNER STATEST	Sex: f



IN THE PHILADELPHIA MUNICIPAL COURT,

PHILADELPHIA, PENNSYLVANIA

3

4

2

1

JODI H. BROWN, M.D., : Plaintiff:

5

vs.

6

7

MARA FLAMM,

Defendant: NO. SC-0-02-20-1994

8

9

10

1 1

1 2

13

1 4

15 16

19 20

2 1

2 2

2 3

2 4

December 5, 2001

Statement for the record taken at the Law Offices of Sarner & Associates,
Eleven Penn Center, 29th Floor, Philadelphia,
Pennsylvania, beginning at approximately
10:00 a.m. before Angela M. Mazzio,
Professional Court Reporter and Notary Public in and for the Commonwealth of Pennsylvania.

SUMMIT COURT REPORTING, INC.

Professional Court Reporters

and Videographers

1500 Market Street, 12th Floor - East Tower

Philadelphia, Pennsylvania 19102

(215) 665-5633 * (609) 567-3315

```
APPEARANCES:
 1
 2
 3
            Law Offices of Sarner & Associates
                  LEONARD SARNER, ESQUIRE
 4
            Eleven Penn Center, 29th Floor
            1835 Market Street
 5
            Philadelphia, Pennsylvania 19103
            (215) 496-1396
 6
            Representing the Plaintiff
 7
 9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
2 4
```

MR. SARNER: This proceeding involves the deposition of Mara
Flamm in the case of Jodi H. Brown,
M.D. versus Mara Flamm

7

8

9

10

11

12

1 3

14

1.5

. 16

.17

18

19

2.0

2 1

2.2

23

24

in the Philadelphia Municipal Court, No. SC-01-02-20-1994.

It is now 10 o'clock a.m. on December 5, 2001 at the Law Offices of Sarner & Associates, 1835 Market Street, Eleven Penn Center, 29th Floor, Philadelphia, Pennsylvania 19103.

I am submitting to the court reporter the Notice of Taking
Deposition in Aid of Execution
issued by the Law Firm of Sarner &
Associates by Joshua Sarner, one of
the partners, to Mara Flamm in care
of Pierce College, 1420 Pine Street,
Philadelphia, Pennsylvania
19102-4699. And also sent to her
home address at Mara Flamm,
709 S. Schell Street, Philadelphia,

Pennsylvania 19147. And I ask that the court reporter place this as an exhibit in this deposition hearing.

This law firm has been advised by the husband of Mara Flamm by telephone that the witness scheduled for the deposition will not appear at this hearing.

At 10 o'clock, at which time the hearing was to proceed, she is not present in the Law Offices of Sarner & Associates nor in the building, Eleven Penn Center, nor downstairs in the lobby.

We will wait until

10:30 a.m. to determine if

Mrs. Flamm will appear as the

deposed witness. If not, the

hearing will be closed. It is now

five after ten on the scheduled date

and we will wait 25 minutes to 10:30

and resume the hearing to determine

whether she does appear.

1 (Whereupon, a short recess 2 was taken.) 3 4 MR. SARNER: We have 5 interrupted this proceeding to give 6 the witness to be deposed, Mara 7 Flamm, additional time to come to 8 the Law Offices of Sarner & Associates, 29th Floor, 1835 Market 10 Street, Eleven Penn Center, 11 Philadelphia, Pennsylvania, 19103. 12 It is now 10:40 a.m. on 13 December 5, 2001 and Mrs. Flamm has 14 not appeared at the Offices of 15 Sarner & Associates, nor has she 16 been seen or present in the lobby of 17 the building. Accordingly, the 1.8 19 hearing is closed. 20 21 22 23 24

CERTIFICATION

3

1

4

5

6 7

9

10

1 1

1 2

1 3

1 4

1.5

16

1.7

18

19

2 0

21

22

23

2 4

I hereby certify that the proceedings, evidence, and objections noted are contained fully and accurately in the notes taken by me in the hearing of the above matter, and that this is a correct transcript of the same.

-by. la ! ! (asy)=-

Angela M. Mazzio

Professional Court Reporter

and Notary Public

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or supervision of the certifying reporter.)

03/07/2005 Page 11 of 41

W&B

WILK & BRAND, P.C.

1200 WALNUT STREET, 5TH FLOOR • PHILADELPHIA, PA 19107 • TELEPHONE (215) 985-1500 • FAX (215) 546-5355

Ronald G. Wilk Robert P. Brand Laurence A. Mester Michael D. Caramelo MONTGOMERY COUNTY OFFICE
P O BOX 333
BLUE BELL PENNSYLVANIA 19422
(215) 542-1613
FAX (215) 542-0956

NEW IERSEY OFFICE
4 GREENTREE CENTRE, SUITE 201
MARLTON, NEW IERSEY 08053
1856) 985-7525
FAX 1856) 988-0657

November 16, 2001

Via Facsimile Transmission & U.S. Mail (215) 568-1044
Josh Sarner, Esquire
SARNER & ASSOCIATES
11 Penn Center, 29th Floor
Philadelphia, PA 19103

RE: Jodi H. Brown, M.D. v. Mara Flamm

Dear Mr. Sarner:

Please be advised that the \$1200.00 verbal offer I made to you to settle the above-captioned matter is hereby withdrawn.

Very truly yours,

WILK & BRAND, P.C.

ROBERT P. BRAND

RPB/mdf

SARNER & ASSOCIATES

EBONARD SARNER JOSHUA SARNER* PAUL M. LEWIS?*

OF COUNSEL: EDWARD B. SHILS, PH.D., S.J.D.

*ALSO ADMITTED IN N.J.

*ALSO ADMITTED IN N.Y.

11 PENN CENTER, 29TH ELOGR SERIDADEGPHIA PA. 19103 TEE: (215) 496-1339. FAX: (215):568-1044.

> Tel: (856) 616,9393 Pax (856) 795,8221

January 22, 2002

Via Certified Mail, Return Receipt Requested and First Class Mail

Ms: Mara Flamm c/o Peirce College 1420 Pine Street Philadelphia: PA 19102-4699

Ms Mara Flamm 709 South Schell Street Philadelphia: PA 19147

> RE: Jodi H. Brown, M.D. vs. Mara Flamm No. SC-01-02-20-1994

Dear Ms. Flamm

Enclosed is the executed Ritle to Show Cause and Petition in the above matter, setting the hearing date for February 21, 2002 at 1:30 p.m. in Courtroom 4-B, 4th Floor, 34 South L1th Street, Philadelphia

Very truly yours,

osh Sower My

JOSH SARNER

JS/lbh-a Enclosure

cc. Robert P. Brand, Esquire (Via Regular Mail) SARNER & ASSOCIATES By: Joshua Sarner, Esquire I.D. #54463 11 Penn Center, 29th Floor Philadelphia, PA 19103 215-496-1396 Attorneys for Plaintiff Jodi H. Brown, M.D.

HEARING DATE ASSIGNED

JAN 2 2 2002

JAN 2 100 2002

RT M.C. JUDGMENT 8
PETITION DEPT.

IN THE PHILADELPHIA MUNICIPAL COURT

JODI H. BROWN, M.D.,	:
Plaintiff,	No. SC-01-02-20-1994
v	: :
MARA FLAMM,	
Defendant,	:
	O SHOW CAUSE , 2002, the Court having read and ule on the Defendant to show cause why the Plaintiff
	(2b), 2002 at o'clock, in Courtroom
4th Floor, 34 South 11th Street, Philac	delphia, PA.
	BY THE COURT:
	15/51/De stin

SARNER & ASSOCIATES By: Joshua Sarner, Esquire I.D. #54463 11 Penn Center, 29th Floor Philadelphia, PA 19103 215-496-1396 Attorneys for Plaintiff Jodi H. Brown, M.D.

IN THE PHILADELPHIA MUNICIPAL COURT

JODI H. BROWN, M.D.,	:
Plaintiff,	: No. SC-01-02-20-1994
v.	: :
MARA FLAMM,	: :
Defendant,	: :
<u>OF</u>	<u>rder</u>
AND NOW, this day of	2002, Plaintiff Jodi H. Brown's Petition to
Compel Oral Deposition in Aid of Execution of	Defendant Mara Flamm is GRANTED.
Defendant Mara Flamm shall appear for an oral	deposition within twenty (20) days of the date of
this Order, and shall bring with her all documer	ats specified in the original Notice of Deposition,
dated October 19, 2001.	
ВУ	THE COURT:
	J.

SARNER & ASSOCIATES By: Joshua Sarner, Esquire I.D. #54463 11 Penn Center, 29th Floor Philadelphia, PA 19103 215-496-1396 Attorneys for Plaintiff Jodi H. Brown, M.D.

IN THE PHILADELPHIA MUNICIPAL COURT

JODI H. BROWN, M.D.,

γ.

Plaintiff,

No. SC-01-02-20-1994

Page 16 of 41

MARA FLAMM,

Defendant,

PETITION TO COMPEL DEPOSITION IN AID OF EXECUTION OF DEFENDANT MARA FLAMM

Plaintiff, Jodi H. Brown, through undersigned counsel, hereby petitions this Court for an Order compelling Defendant Mara Flamm to attend a deposition in aid of execution, and in support hereof avers as follows:

- 1. On or about February 20, 2001, this action was commenced by the filing of a Statement of Claim by Plaintiff Brown against Defendant Flamm.
- 2. On or about April 4, 2001, a default judgment was entered in favor of Brown and against Flamm in the amount of \$6,215 plus \$65 costs.
- 3. On October 19, 2001, Defendant Mara Flamm's Deposition in Aid of Execution was noticed for December 5, 2001. A copy of the Notice of Deposition is attached hereto as Exhibit "A."
 - 4. Notice of this deposition was forwarded to Defendant Flamm as follows:

- a. By hand delivery. A copy of the Return of Service, wherein service was accomplished, is attached hereto as Exhibit "B."
- b. By regular and certified mail. The regular mail was not returned, and the certified mail was returned unclaimed. A true and correct copy of the transmittal letter and returned certified envelope is attached hereto as Exhibit "C."
- 5. On November 16, 2001, settlement negotiations with Flamm's husband and counsel, Robert P. Brand, Esquire, broke down. A copy of Mr. Brand's November 16, 2001 letter is attached as Exhibit "D."
- 6. On December 4, 2001, Mr. Brand advised counsel by telephone message that Flamm would not appear at the deposition. No reason was given for the failure to appear.
- 7. December 5, 2001, Flamm failed to appear for her oral deposition without justification or cause. A copy of the transcript of the deposition is attached hereto as Exhibit "E."

WHEREFORE, it is respectfully requested that this Honorable Court enter an Order compelling the appearance of Mara Flamm for her oral deposition and to bring with her all documents previously requested.

Respectfully submitted,

SARNER & ASSOCIATES

BY:

Joshua Sarner, Esquire

Attorney I.D. No. 54463

11 Penn Center - 29th Floor

1835 Market Street

Philadelphia, PA 19103

Phone: 215-496-1396

Date: January 92002

CERTIFICATE OF SERVICE

I, Joshua Sarner, Esquire, do hereby certify that on this true and correct copy of the foregoing Motion to Compel Deposition in Aid of Execution of Defendant Mara Flamm was served as set forth below:

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED AND REGULAR MAIL

Mara Flamm C/O Peirce College 1420 Pine Street Philadelphia, PA 19102-4699

Mara Flamm 709 S. Schell Street Philadelphia, PA 19147

BY REGULAR MAIL

Robert P. Brand, Esquire Wilk & Brand, P.C. 1200 Walnut Street 5th Floor Philadelphia, PA 19107

DATED: 1/9/02

SARNER & ASSOCIATES By: Joshua Sarner, Esquire I.D. #54463 11 Penn Center, 29th Floor Philadelphia, PA 19103 215-496-1396 Attorneys for Plaintiff

IN THE PHILADELPHIA MUNICIPAL COURT

JODI H. BROWN, M.D.,

v.

Plaintiff,

No. SC-01-02-20-1994

MARA FLAMM,

Defendant,

NOTICE OF TAKING DEPOSITION IN AID OF EXECUTION

To: Mara Flamm
C/O Peirce College
1420 Pine Street
Philadelphia, PA 19102-4699

Mara Flamm 709 S. Schell Street Philadelphia, PA 19147

PLEASE TAKE NOTICE that, pursuant to Pennsylvania Rule of Civil Procedure 3117, the undersigned will take the deposition upon oral examination of Mara Flamm, before a notary public or other person authorized by law to administer oaths. The deposition will commence on December 5, 2001, at 10:00 a.m., and continue from day to day until completed, unless otherwise adjourned. The testimony will be taken at the offices of Sarner & Associates, 11 Penn Center - 29th Floor, 1835 Market Street, Philadelphia, PA 19103, at which time and place Defendant is directed to appear and bring with him/her the following:

- 1. All of Defendant's tax returns and supporting schedules (federal, state and local) which were filed, either individually or jointly, for the calendar years 1998 to the present.
- 2. All passbooks, statements and deposit slips for the preceding twelve (12) months for any savings account, money market account, trust account, IRA accounts, 401(k) account, KEOGH plan, interest bearing account or similar account at any bank, savings institution, credit union or other financial institution held by Defendant, either individually or jointly.
- 3. All statements, canceled checks, deposit slips and checkbook registers for the preceding twelve (12) months for any checking account held in Defendant's name, either individually or jointly.
- 4. All stocks, bonds or other securities of any kind whatsoever owned by Defendant, individually or jointly, a list of all securities held by any other persons, brokerage houses or banks for Defendant in trust, by pledge or otherwise; and all statements, invoices and other documents from brokers or brokerage services in connection therewith.
- 5. Any and all insurance policies or riders thereto, for the yeas 1998 to the present, which cover the loss of personal property where the Defendant is a named beneficiary.
- 6. A list of all real estate owned by Defendant, or in which Defendant has or had any interest of any kind whatsoever, or which someone else held for Defendant in trust or otherwise, during the preceding twelve (12) months.
- 7. Any and all financial statements whether prepared by or for the Defendant during the preceding twenty-four (24) months.
- 8. Any application for a loan made by the Defendant, either individually or jointly, during the past twenty-four (24) months.

- 9. All deeds, indentures, bonds, mortgages, title insurance policies, public liability insurance policies, tax bills, leases, and all other documents evidencing any legal or equitable interest in real estate owned by Defendant, or in which he/she has or had within the last twenty four (24) months any interest of any kind whatsoever or which someone else holds for him/her in trust or otherwise.
- 10. Any and all certificates of deposit, promissory notes, security agreements, mortgages, mechanic's liens, or other evidences of indebtedness of any kind whatsoever owing to Defendant, individually or jointly, or held for Defendant in trust or otherwise.
- 11. A list of all motor vehicles, mobile homes, or boats owned by Defendant, either individually or jointly.
- documents evidencing any legal or equitable interest in any motor vehicles, mobile homes or boats owned by Defendant during the preceding twenty-four (24) months, or in which the Defendant has had any interest of any kind whatsdever or which someone else holds or has held for the Defendant in trust or otherwise.
 - 13. All documents reflecting the Defendant's right to receive royalties from any source.
- 14. The names and locations of all banks or other institutions in which the Defendant rents or rented in the last twenty-four (24) months, a safe deposit box, and the keys thereto.

15. All documents evidencing if the Defendant is a beneficiary of any trust.

SARNER & ASSOCIATES

BY:

Joshua Sarner, Esquire Attorney I.D. No. 54463 11 Penn Center - 29th Floor 1835 Market Street Philadelphia, PA 19103

Phone: 215-496-1396 Fax: 215-568-1044

Dated: 10/19/01

AFFIDAVIT OF SERVICE

PLAINTIFF (S	-}	-	10	0410.00		
				OURT TERM an		COUNTY
DEFENDANT (S)	H. Brown			2-01-02-20	- 1994	PHICA PA.
	,		Di	ATE PREPARED		SERVED BY
MARCA 1	HAMM, PIERCE MAKEA FLAMM, 100 PILM 58.	TR. Coultat				
SERVE AT AC	MAYA Elman	Parent		Civil Action		JOHN MANSAUNOS
14	LA PLANT SC	TEOPESSOR		Summons		Subpoena Notice of Real Estate Sale
. 01	-1.6.1-		□v	Vrit.Of -	—— (∟JOiher
VV	nix A 19106		COL	MPANY CONTRO	L NUMBE	R
SPECIAL INST	RUCTIONS					
Consol and a						
The Status	ide known to MJ	MARA FLAVORM BY	SUPERVISOR.	MS PLAKINS	K/K·C	12:110; BE.Hone; DK.S. Ver So. 1424.PM
on the 2cm	day of O	CYTOCK AT 2:041	n	at /	- 110 G	-, IN WE THE DES
at 1420-1	PLUX ST PLEASE TO	TR. COLLEGE HOLE P		On t	[470]	lex so. SHUA.PM
Commonwealth	of Pennsylvania in	the manner described		County of	PHILA	
Defendant(s)	personally served	i wie manner describe	a Delow:			· · · · · · · · · · · · · · · · · · ·
J Adult family m	amhar with whom a	said Defendant(s) resid	deles mades			
Adult in charg	e of Defendant's res	Sidence who refused to	de(s). Relationsh	ip is		
/l	on in chame of Defe	endants's office or usu	al place of busin	≃iauonsnip. Ass #1€ PX££	Construction of	Commente on Designation
Agent of person						7.500.000 17.500.000 3 5.000
Adult in charg Agent of person			ar prace of bushi	an officer	of said D	efendant company.
					OI SAIL D	Defendant company.
					OI SAIL D	revenuant company.
Description A	Age: 30 He	ight: الم Weigh	t 110	Race: BCMA	C	Sex: F
Description A	Age: 30 Hei	ight: (") Weigh	t: 110	Race: BCHA	C	Sex: F
Description A	Age: 30 Hei	ight: الم Weigh	t: 110	Race: BCHA	C	retendant company.
Description A	Age: 30 Hei	ight: (") Weigh	t: 110	Race: BCHA	C	Sex: F
Description A On the 30 Defendant not fo	Age: 30 Hein May of day of nund because:	ight: (") Weigh	t: 110	Race: BCHA	C	Sex: F
Description A On the Defendant not fo	Age: 30 Heim day of day of nund because: VER	ight: ([°] ↓ Weigh <i>ocyodét</i> Moved □ Unknown	t: //0 . 13-4080	Race: BCALA , at <u></u>	C	Sex: F
Description A On the 30 Defendant not fo	Age: 30 Heim day of day of nund because: VER	ight: ([°] ↓ Weigh <i>ocyodét</i> Moved □ Unknown	t: //0 . 13-4080	Race: BCALA , at <u></u>	C	Sex: F
Description A On the 30 Defendant not for IAME OF SERV TO W. MANGUA E/She is process	Age: 30 Heing duly sw	ight: (" → Weight OCTOVEL Moved □ Unknown vorn according to law,	t: //0 No Answer deposes and sa	Race: BCALA , at <u>rea</u>	C	Sex: F
Description A On the 30 Defendant not for IAME OF SERV TO W. MANGUA E/She is process	Age: 30 Heing duly sw	ight: (" → Weight OCTOVEL Moved □ Unknown vorn according to law,	t: //0 No Answer deposes and sa	Race: BCALA , at <u>rea</u>	C	Sex: F
Description A On the 30 Defendant not for IAME OF SERV IN MANGUA e/she is process ue and correct to	Age: 30 Heing duly sw	ight: ("	t: //0 No Answer deposes and sa	Race: BCALA , at <u>rea</u>	C	Sex: F
Description A On the	Age: 30 Heing duly sw	ight: (") Weight October Moved Unknown worn according to law, es; and that the facts howledge, information	t: ///0 No Answer deposes and sagerein set forth a and belief.	Race: BCHCA, at	C	Sex: F
Description A On the 30 Defendant not for IAME OF SERV To be MANSAVA e/she is process we and correct to	Age: 30 Heing duly sw	ight: (") Weight October Moved Unknown worn according to law, es; and that the facts howledge, information	t: //0 No Answer deposes and sa	Race: BCHCA, at	C	Sex: F
Description A On the Defendant not for IAME OF SERV I S W MANSAVA E/she is process be and correct to	de: 30 Heing duly swing the best of their kr	ight: (") Weight Octoved Unknown Worn according to law, es; and that the facts howledge, information Process Ser	t: ///0 No Answer deposes and sagerein set forth a and belief.	Race: BCHA , at	Other The	Sex: F
Description A On the 20 Defendant not for NAME OF SERV TO WE MANGELYA e/she is process we and correct to heriff aw Firm	de: 30 Heing day of und because: All being duly swisserver herein name of the best of their known the best of the best of their known the best of th	ight: (") Weight OCTOVEL Moved Unknown worn according to law, es; and that the facts howledge, information Process Ser	t: ///0 No Answer deposes and sagerein set forth a and belief.	Race: BCHCA, at	Other The	Sex: F
Description A On the 30 Defendant not for NAME OF SERV I W MANGUA e/she is process we and correct to heriff aw Firm ttorney's Name	de: 30 Heing duly swing the best of their kr	ight: (") Weight OCTOVEL Moved Unknown worn according to law, es; and that the facts howledge, information Process Ser	t: ///0 No Answer deposes and sagerein set forth a and belief.	Race: BCHA , at	Other T	Sex: F
Description A On the 30 Defendant not fo IAME OF SERV TO W. MANGUA e/she is process	de: 30 Heing day of und because: All being duly swisserver herein name of the best of their known the best of the best of their known the best of th	ight: (") Weight OCTOVEL Moved Unknown worn according to law, es; and that the facts howledge, information Process Ser	t: ///0 No Answer deposes and sagerein set forth a and belief.	Race: BCHA , at	Other T	Sex: F
Description A On the 30 Defendant not for NAME OF SERV I W MANGUA e/she is process we and correct to heriff aw Firm ttorney's Name	Age: 30 Heing day of	ight: (") Weight OCTOVEL Moved Unknown worn according to law, es; and that the facts howledge, information Process Ser	t: ///0 No Answer deposes and sagerein set forth a and belief.	Race: BCHA , at	Other T	Sex: F
Description A On the	Age: 30 Heimand day of found because: WER WER WER We being duly swith the best of their known the best of the	ight: (" → Weight OCTOVEL Moved □ Unknown vorn according to law, es; and that the facts howledge, information Process Ser Process Ser WH LSE T SS. (1914 pt) FULL FI	t: ///0 No Answer deposes and sagerein set forth a and belief.	Race: BCHA , at	Other T	Sex: F

SARNER & ASSOCIATES
A PROFESSIONAL CORPORATION OF ATTORNEYS AT LAW

LEONARD SARNER JOSHUA SARNER* PAUL M. LEWIS**

OF COUNSEL: EDWARD B. SHILS, PH.D., S.J.D.

*ALSO ADMITTED IN NJ
** ALSO ADMITTED IN NY

11 PENN CENTER, 29TH FLOOR PHILADELPHIA, PA 19103 TEL: (215) 496-1396 FAX: (215) 568-1044

> 13 Tanner Street Haddonfield, NJ 08033 Tel: (856) 616-9393 Fax: (856) 795-8221

October 19, 2001

Via Certified Mail, RRR

Ms. Mara Flamm 709 South Schell Street Philadelphia, PA 19147

RE: Jodi H. Brown, M.D. vs. Mara Flamm

Dear Ms. Flamm:

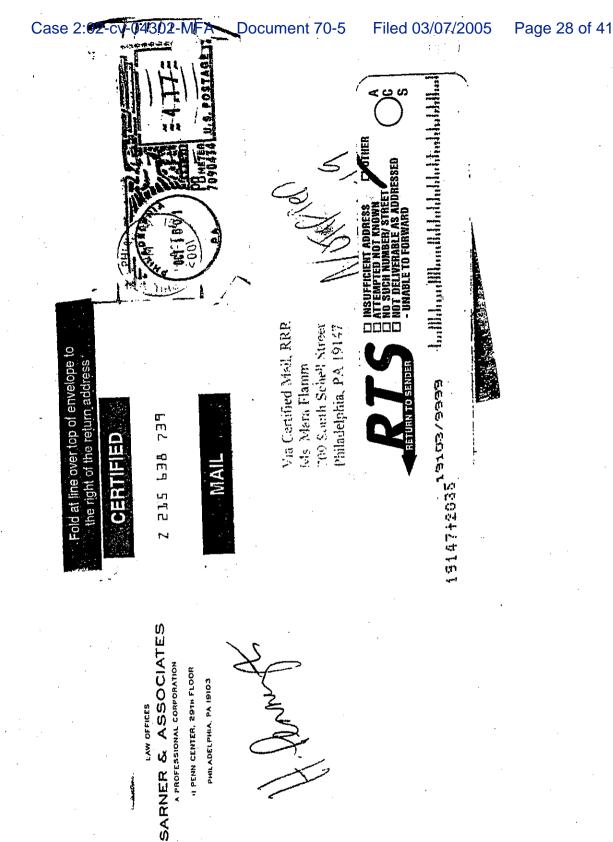
Enclosed please find a Notice of Taking Deposition in Aid of Execution in the above-referenced matter.

Sincerely,

JOSH SARNER

JS:lbh-a Enclosure

cc: First Class Mail



W&B

WILK & BRAND, P.C.

1200 WALNUT STREET, 5TH FLOOR • PHILADELPHIA, PA 19107 • TELEPHONE (215) 985-1500 • FAX (215) 546-5355

Ronald G. Wilk Robert P. Brand Laurence A. Mester Michael D. Caramelo MONTCOMERY COUNTY OFFICE
PO BOX 333
BLUE BELL PENNSYLVANIA 19422
(215) 542-1613
FAX (215) 542-0950

NEW IERSEY OFFICE 4 GREENTREE CENTRE, SUITE 201 MARLTON, NEW IERSEY 08053 (856) 985-7525 FAX 18561 988-0657

November 16, 2001

Via Facsimile Transmission & U.S. Mail (215) 568-1044
Josh Sarner, Esquire
SARNER & ASSOCIATES
11 Penn Center, 29th Floor
Philadelphia, PA 19103

RE: Jodi H. Brown, M.D. v. Mara Flamm

Dear Mr. Samer:

Please be advised that the \$1200.00 verbal offer I made to you to settle the above-captioned matter is hereby withdrawn.

Very truly yours,

WILK & BRAND, P.C.

ROBERT P. BRAND

RPB/mdf

ORIGINAL

```
IN THE PHILADELPHIA MUNICIPAL COURT,
1
               PHILADELPHIA, PENNSYLVANIA
2
3
    JODI H. BROWN, M.D.,
                  Plaintiff:
4
5
              vs.
6
                                NO. SC-0-02-20-1994
    MARA FLAMM,
                  Defendant:
7
8
9
10
                                  2001
                     December 5,
11
12
             Statement for the record taken at the
13
     Law Offices of Sarner & Associates,
14
     Eleven Penn Center, 29th Floor, Philadelphia,
15
     Pennsylvania, beginning at approximately
16
     10:00 a.m. before Angela M. Mazzio,
17
     Professional Court Reporter and Notary Public
18
     in and for the Commonwealth of Pennsylvania.
19
20
 2.1
                SUMMIT COURT REPORTING, INC.
               Professional Court Reporters
 22
                     and Videographers
       1500 Market Street, 12th Floor - East Tower
 23
            Philadelphia, Pennsylvania
              (215) 665-5633 * (609) 567-3315
 24
```

```
APPEARANCES:
1
2
             Law Offices of Sarner & Associates
3
                   LEONARD SARNER, ESQUIRE
             Eleven Penn Center, 29th Floor
4
             1835 Market Street
                                            19103
             Philadelphia, Pennsylvania
5
             (215) 496-1396
6
             Representing the Plaintiff
7
 9
10
11
12
<u>1</u>3
14
1.5
1€
17
19
19
2.0
2.1
 2.2
 2.3
 24
```

2

3

4

6

7

8

9

10

11

12 13

14

15

16

17

18

19

20

2 1

2 2

23

24

MR. SARNER: This proceeding involves the deposition of Mara Flamm in the case of Jodi H. Brown, M.D. versus Mara Flamm in the Philadelphia Municipal Court, No. sc-01-02-20-1994.

It is now 10 o'clock a.m. on December 5, 2001 at the Law Offices of Sarner & Associates, 1835 Market Street, Eleven Penn Center, 29th Floor, Philadelphia, Pennsylvania 19103.

I am submitting to the court reporter the Notice of Taking Deposition in Aid of Execution issued by the Law Firm of Sarner & Associates by Joshua Sarner, one of the partners, to Mara Flamm in care of Pierce College, 1420 Pine Street, Philadelphia, Pennsylvania 19102-4699. And also sent to her home address at Mara Flamm, 709 S. Schell Street, Philadelphia,

2

3

4

5

6

8

1 C

11

12

13.

14

_ 5

16

- 7

18

19

20

21

2 2

23

24

Pennsylvania 19147. And I ask that the court reporter place this as an exhibit in this deposition hearing.

This law firm has been advised by the husband of Mara Flamm by telephone that the witness scheduled for the deposition will not appear at this hearing.

At 10 o'clock, at which time the hearing was to proceed, she is not present in the Law Offices of sarner & Associates nor in the building, Eleven Penn Center, nor downstairs in the lobby.

We will wait until

10:30 a.m. to determine if

Mrs. Flamm will appear as the

deposed witness. If not, the

hearing will be closed. It is now

five after ten on the scheduled date

and we will wait 25 minutes to 10:30

and resume the hearing to determine

whether she does appear.

SUMMIT COURT REPORTING, INC.

(Whereupon, a short recess was taken.)

5

6

.7

8

2

MR. SARNER: We have interrupted this proceeding to give the witness to be deposed, Mara Flamm, additional time to come to the Law Offices of Sarner & Associates, 29th Floor, 1835 Market Street, Elever Penn Center, Philadelphia, Pennsylvania, 19103.

10

9

12

1 1

13

14 15

16

17

18

<u>: 9</u>

2 0

21

2 2 23

24

It is now 10:40 a.m. on December 5, 2001 and Mrs. Flamm has not appeared at the Offices of Sarner & Associates, nor has she been seen or present in the lobby of the building. Accordingly, the hearing is closed.

CERTIFICATION

2 3

4

5

7

8

9

1

I hereby certify that the proceedings, evidence, and objections noted are contained fully and accurately in the notes taken by me in the hearing of the above matter, and that this is a correct transcript of the same.

1.0

1.3

12

13

_ 4

15

16

- 7 18

19

2.0

2: 22

2.3

24

Angelo M. Mayor

Angela M. Mazzio

Professional Court Reporter and Notary Public

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or supervision of the certifying reporter.)

Return of Service

On the 24nt day	of Thrunky			
I. TO HU PHYTUS AVABLE	, served with the foregoin	ng subpoena by (de-		
scribe method of service): Fruit Deciviled	To rece course			
ON 1-24.03 MT 1:12 PM. Mrs CHRMINTA RUTLING WHO LECOPTED LEAK DOCUMENTS FOR				
ROHESSOL MINIT PLANING WILL WAS VI	undually of the Time			
I verify that the statements in the understand that false statements herein are § 4904 relating to unsworn falsification to	e made subject to the penal			
1.24.02 Date	John naturna	> ature		

MS MAKA FLAMM BY CHRMILTA RUTLEGY

Name of Person Served

Page 41 of 41

JANE MACELHENNEY Attorney at Law Suite 500 1200 Walnut Street Philadelphia, PA 19107 (215) 735-3713 FAX (215) 546-3440

January 25, 2002

TO: Joshua Sarner	
RE: Mara Flamm	
Dear Sir or Madam:	
Enclosed herewith please find the following:	•
() Answer to Motion	() Complaint
() Application for Turnover	() Amended Plan
() Application to Extend Plan	() Amended
() Certificate of Service	() Motion to Avoid Lien
(X) Chapter 7 Petition	() Order Requiring Answer and
() Motion to Extend Plan	Notice of Hearing
() Chapter 11 Petition	() Notice
() Chapter 13 Petition	() Notice of Intent to Seil
() Check in the amount of	() Objection to Proof of Claim
() Application Directed to Debtor's Employer	() Order, Dated
() Certification of No Objection	() Motion for Relief
() Debtor's Motion to Abate Plan Payments	() Stipulation
() Application for Allowance of Counsel Fee	() Summons
() Interrogs/Application	() Motion to sell free and
() Interrogs/Questionnaire	clear of Liens
Stop ALL collections attempts as	id contact at once or we will proceed with a
motion for contempt!!	
	Very truly yours,
•	
•	Jane MarEthenney
Encl.	
	17
	1 /
	1/